IN THE COURT OF CHIEF JUDICIAL MAGISTRATE,
KAMRUP METRO AT GUWAHATI

COMPLAINT CASE No. /2026

Name of the complainant : **Dr. Kishore Das**
Son of: Padma Kanta Das
Resident of: Pub Mazirgaon
P.O- Bhattapara,
P.S-Azara, Dist:Kamrup Metro Assam

Name of the accused :
1. **Dulal Bora ,Chief Executive Officer, NE Bharat 24**,
A digital/news media platform having its registered office at
2nd Floor, Kushan Plaza,
Above Mukesh Hyundai,
GS Road, Dispur, Sarumotoria,
Guwahati, Assam 781006

2. **Editor in Chief of NE Bharat 24**
(Responsible for publication and broadcast of news content),
Address: NE Bharat 24

2nd Floor, Kushan Plaza,
Above Mukesh Hyundai,
GS Road, Dispur, Sarumotoria,
Guwahati, Assam 781006

Phone: +91 91270-20202
Email: info@nebharat24.com
Web: nebharat24.com

3. **Reporter/Anchor concerned**,
   NE Bharat 24,
   (unknown at present)
   having its registered office at

   2nd Floor, Kushan Plaza,
   Above Mukesh Hyundai,
   GS Road, Dispur, Sarumotoria,
   Guwahati, Assam 781006

Under section :	**:**	Section 356 of the Bharatiya Nyaya Samhita
Cause of action arose on and from :	**:**	On **20/01/2026, 28/01/2026**, and all subsequent dates thereafter at Guwahati and all such other places in the state of Assam and India, where telecast and coverage of the **NE Bharat 24**, operating through digital platforms including video news content on social media and other online platforms, Assam is available.
Witnesses:	**:**	**1.** The complainant himself. **2. Dr Dhiraj Pathak**

S/o Late Dinabandhu Pathak,
H/N 73 A, Shantinagar Path, 2no Mathgharia, Noonmati, P.O.-Noonmati, PS- Noonmati, Guwahati District-Kamrup Metro, Assam,
PIN-781020

3. Sri Manoranjan Deka
Son of Late Prabhat Deka
Resident of Kumarikata, Deharkalakuchi, P.S- Mukalmua , P.O- Deharkalakuchi Dist- Nalbari, Assam , PIN- 781310

Any other witnesses as required for the purpose of trial and proper adjudication of the case.

The humble complainant above-named

MOST RESPECTFULLY SHEWETH:

1. That the complainant is a citizen of India and a permanent resident of Pub Mazirgaon ,P.O- Bhattapara ,P.S-Azara, Dist: Kamrup Metro Assam and as such he is entitled to all the rights and protections guaranteed under the Constitution of India and the laws framed there under.

2. That the complainant is a Medical Officer (AYUR) posted as Jiyakur Model Hospital, Kamrup , Amingaon and

attached at Office of Director of AYUSH, Assam vide transfer order dated 22/11/2019.

A photocopy of the Transfer and attachment order dated 22/11/2019 is annexed hereto and marked as **ANNEXURE-1**

3. That Complainant joined Government Service as **Medical Officer (Ayur)** under Health & Family Welfare Department, Govt. of Assam on **25th February 2015 .**

Complainant Completed **BAMS** in 2011 from Govt. Ayurvedic College, Guwahati

Complainant did **MD (Ayurveda)** in *Agada Tantra* – Passed in 2024 from National Institute of Ayurveda (NIA), Jaipur

A photocopy of the Registration certificate of The State Council of Indian Medicine is annexed hereto and marked as **ANNEXURE-2**

4. That the accused No.1 is a Chief Executive Officer of the news portal/media house known as **NE Bharat 24**, operating through digital platforms including video news content on social media and other online platforms, while accused Nos. 2 and 3 are persons responsible for editorial control, publication, and broadcast of news.

5. That the complainant respectfully begs to state that on **20.01.2026** and again on **28.01.2026**, the accused news portal, namely **“NE Bharat 24”, Guwahati**,

broadcast and published news videos on its web-based platform containing **false, fabricated, reckless, and defamatory statements** concerning the complainant. In the said broadcasts, the complainant was deliberately portrayed in a **sarcastic and derogatory manner** as the “Super Director of AYUSH,” with the clear intention of lowering his dignity and professional standing in the estimation of the public.

It was further falsely alleged and insinuated in the said news videos that the complainant exercises unlawful control over so-called “secret files” of the Directorate of AYUSH, which allegations are wholly untrue, baseless, and malicious. The accused, by such publication, also sought to **create unwarranted suspicion in the minds of the viewers** regarding the complainant’s place of posting and his official attachment with the Government Ayurvedic College and the Directorate of AYUSH.

The complainant submits that he has been serving under the AYUSH Department strictly in accordance with official orders dated 22/11/2019 (annexure-1), and is lawfully discharging his duties as a teaching faculty member at the Government Ayurvedic College, Jalukbari, while simultaneously performing his assigned responsibilities as a Medical Officer in the Directorate of AYUSH**,** as per the said official authorization. On 28/01/2026 the NE Bharat 24 published a news defaming the complainant that the Director o AYUSH has curtailed complainant’s official power for the corruption charges leveled against him as per the news. The Complainant has no financial power nor any special power in the Directorate of AYUSH. He is serving as medical officer attached in the

Direcorate of AYUSH. The whole news was telecasted only on suspicion and presumption . That the accused news portal, without possessing any lawful authority, material, or documentary evidence whatsoever, intentionally and recklessly telecast the impugned news with the sole and mala fide object of harassing the complainant and maligning his reputation, and/or with a view to exerting undue pressure upon him for the purpose of extracting unlawful gain, thereby acting in complete abuse of the freedom of the press. The impugned publications are therefore not only false and misleading but are also intended solely to defame the complainant and damage his professional reputation.

Some of the defamatory and false allegations made by the charged accused person against the complainant in the aforesaid telecasted videos dated 20/01/2026 and 28/01/2026 by the web portal namely NE Bharat 24 Guwahati **dated 20/01/2026 and 28/01/2026** are as follows –

Statements of News portal NE Bharat 24 telecasted in the news item dated 20/01/2026 and 28/01/2026 are annexed herewith and marked as **ANNEXURE – 3**
A pen drive consisting the said News items are marked as **Material No. 1 as a part of this complaint .**

Entire transcript of the news item dated 14/02/2014 is annexed herewith and marked as **ANNEXURE – II**
A compact disc consisting the said News item is marked as **Material No. 2 as part of this complaint.**

6. That the complainant begs to state that, the charged accused without having an iota of truth has made the aforesaid allegations against the complainant. The charged accused himself stated in the said news item that the forged documents are needs be verified through forensic test for examination/verification to find out the correctness of his allegation.

7. That the complainant begs to state that the allegations leveled against him by the charged accused are totally defamatory and false and same has maligned his reputation before the society at large. Further the complainant begs to state that he has neither encroached any land of the Batho Mandir which the charged accused has described nor illegally grabbed any land by victimizing any person. Further the properties belongs to him are all acquired by him legally. The complainant further begs to state that, till date, not a single case has been charge sheeted against him before

any court of law as alleged by the charged accused in the aforesaid Talk Show on 13/02/2014.

8. That the complainant begs to state that, after viewing the aforesaid news items and the Talk Show mentioned above, many of the witnesses and other persons, has specifically made comments against the complainant. Moreover, at present, the reputation of the complainant, being alleged as a charge sheeted person, is nothing but a criminal in the eyes of the people.

9. That the complainant respectfully beg to submit that the allegations attributed in the name of the complainant by the accused in the said News Programme and the Talk show are absolutely, false, baseless, concocted and without an iota of truth. The accused has made such statement with an ill intention to tarnish the image and reputation of the complainant in the society and for his undue gain. The charged accused made aforesaid statements without any material and he has made those statements with an intention to malign the image of the complainant in the eyes and estimation of others. The charged accused thereby tarnished the reputation of the complainant through out the state of Assam and as well as in other parts of the country where telecast of “Prag” is available. Such defamatory and derogatory statements of the charged accused against the complainant has caused substantial damage to his reputation before the society at large and also inflicted a slur in the political career. Making of such incorrect and false statements by the charged accused with an intention to harm the reputation and image for the purpose of damaging the

political career of the complainant clearly comes under the purview of the penal laws relating to the offence of defamation.

10. That the complainant has come to know from the witnesses that the name and fame of the complainant had been tarnished in the eyes and estimation of the persons viewing the aforesaid news items and also before his near friends, political members/supporters of his constituency and relatives due to the said false imputations and defamatory remarks made by the charged accused person.

11. That after broadcasting of the aforesaid news item on various dates, several friends, supporters of the constituency, relatives and acquaintances of the complainant had put embarrassing questions to the complainant in person and also over telephone regarding such statements made by the accused, thereby causing irreparable damage to his reputation. Thus, it is abundantly clear that the image of the complainant had been harmed in the eye of the public and especially before this near friends, supporters of his constituency and relatives and well wishers.

12. That the complainant begs to state that on several occasions, some people from his place and his friends questioned the integrity of the complainant as they seen the statements leveled by the accused in the aforesaid programmes against the complainant and also informed the complainant that his reputation in their eyes and

estimation has been deeply degraded. The complainant is highly aggrieved by the irresponsible, false and baseless defamatory statements of the accused person made on **13/02/2014, 14/02/2014** at the Talk Show and the news items broadcasted by Prag, Guwahati channel against the complainant.

13. That the complainant begs to state that by making such defamatory and derogatory statements against the complainant as stated hereinabove, the accused person has committed offences of defamation triable under section 499/500 of the Indian Penal Code and are liable to be prosecuted there under.

14. That the cause of action arose within the jurisdiction of this Hon'ble Court on **13/02/2014, 14/02/2014** and all places wherein the said satellite television channel, namely, Prag, Assam has coverage.

15. That the complainant begs to state that the witnesses shall substantiate the case and, if necessary, the complainant would produce other witness/witnesses and materials by making prayer under Sec. 91 of Code of Criminal Procedure before this Hon'ble Court to substantiate his case.

16. That this complaint petition is filed bonafide and for ends of justice.

In the premises as aforesaid, it is therefore, prayed that Your Honour may be pleased to take cognizance of the offence and issue process

against the accused person under section 499/500 of the Indian Penal Code and after and after trial of the instant case convict and sentenced the accused in accordance with law .

In the pending disposal of the instant trial, Your Honour may further pleased to direct the aforesaid broadcasting authority i.e. the satellite television channel, namely, Prag, Guwahati to preserve the original records(telecasted material) of the Talk Show telecasted on **13/02/2014** at **8 P.M** along with the News programme telecasted on **14/02/2014** at **7 P.M** in the News Channel namely Prag, Guwahati respectively till pendency of this trial and/or be pleased to pass any such order or further orders as your Honour may deem fit and proper.

And for this act of kindness, your humble complainant shall as in duty bound ever pray.

Affidavit/-

A F F I D A V I T

I, **SRI MANASH BORAH,** Son of Sri Akon Bora, aged about 33 years, resident of, Seuj Nagar, House No 37, Beltola Tiniali, Guwahati 781028, in the district of Kamrup(M), Assam do hereby solemnly affirm and declare as follows;

1. That I am the complainant of the instant complaint petition and as such I am well acquainted with the facts and circumstances of the case and therefore I am competent to swear this affidavit.

2. That the statements made in this affidavit and in paragraphs _____ _____&___are true to my knowledge and those made in paragraphs _____ & ____ being matters of records are verily believed to be true and the rest are my humble submissions before this Hon’ble Court.

Oath

That I do hereby swear that this declaration is true and correct and that it conceals nothing and that no part of it is false, so help me God.

And I sign this affidavit on this the ___ day of March 2014 at Guwahati.

Identified by me

Advocate

DEPONENT

Solemnly affirmed before me this day, I certify that I read over and explained the contents to the declarant and that the declarant seemed perfectly to understand them.

In The Court of Civil Judge No…….. Kamrup(M) At Guwahati

Title Suit No……./2014

Dr. Abhijeet Baruah

S/o Sri Ranjit Baruah

Resident of Atila Gaon

Near P & T Colony

P.O- Jorhat. District- Jorhat

Assam.

.....Plaintiff

Versus

1. Mr. Anil Mahanta

   S/o- Bhola Mahanta
   R/o-
   TengapukhuriHuladhora
   Gaon, Mathurapur,
   District- Sivsagar, Assam.
2. Mr. Pankaj Jyoti Bora

   S/o- Rupeswar Bora
   Dhekorgorah
   Block,District-Jorhat,
   Assam
3. Smti. Anindita Dutta Tamuoly

   W/o-
   R/o-
   .....Main
   Defendants.
4. Executive Editor Mr. Prashanta Raj Bhuyan ”Amar Asom” Assamese daily News Paper, G.L Publications Limited, G.S Road, Ulubari Guwahati-

07, District kamrup(M) Assam.

5. Executive Editor “Mr.Utpal baruah “Dainik Janambhumi” Assamese daily News paper. Janmbhumi Press Private Limited, Shed No.-A-1 MIE Kalapahar, Guwhati-781016.

   Head Office at R.G Baruah Road, Guwahati-781005.

6. Executive Editor Mr. Sankar Lashkar “Niyamia Barta” Assamese daily News paper. Arkashish Publications Pvt. Ltd on behalf of Mayor Talukdar, Katahbari, Garchuk, Guwahati-781035.

7. Executive Editor Mr. Jogesh Mazumdar “sankar Jyoti” Assamese Daily News Paper. Arkashish Publications. Madhuram Deka Kathbari, garchuk Guwahati-781035.

.....Profoma Defendants

The suit is for damages and compensation of plaintiff and for injunction.

The suit for damages and compensation…….defamation of Plaintiff and also for injunction.

Suit is valued at Rs…….. And court fee of Rs……../-is paid thereof, injunction is valued at Rs. 150/- and fixed court fee Rs.11/- is paid separately.

Most Respectfully Sheweth:

1. That the Plaintiff is a citizen of India by birth and Permanent resident of aforesaid locality. That the Plaintiff is young renowned sportsman of Assam and he achieved very good name and fame in various sports categories Boxing, Huang Thai, Kick Boxing, Wushu Thang-Ta art, Marathon, swimming, Running etc. Over the years 2003 till date he became Guinness Book of Records holder in the year 2013.
2. That the Plaintiff has qualified and made records and he is acknowledged as “Indian Book of Records” and “Asia Book of records” in the year 2012, besides he qualified for Guinness Book of Records 1st audition in

2011, India & Limca Book of records 2011, Guinness Book of records 2012, Asia Book of records in two sports events Assisst world record & world record University's Record & World Record University's Record and also kriya Ratna award 2012.

A complete Bio data of the Plaintiff regarding his achievements and records is filed herewith.

3. That the plaintiff was qualified and achieved Guinness Book of Records which was held on 8th April 2013 at India gate, New Delhi and it was presented to him by Hon'ble Chief Minister of Assam Sri Tarun Gogoi in presence of officials of Guinness Book of Records for weaving longest hand woven sheet of silk(Gamosa).
4. That the plaintiff is a renowned sports star of Assam and he achieved many models gold, silver, bronze in different sports activities at state level, national level etc and he is a black belt holder and material arts player that the plaintiff has made 13 records including Guinness world records hence worldwide reputed agencies such as Guniuss world records, Limca Book of records, Assist world records and Asia book of Records has duly recognised the plaintiff is achievement with their citations/certificates etc.

5. That the world record university, V.K has the degree of Doctorate while record breaking for most number of punches on a punching pad in one minute duly following the procedures set by the said university and the plaintiff applied before the esteem world record university V.K by submitting his thesis etc accordingly he was conferred with the doctorate degree on 27.02.2013 in the convocation ceremony held at “Indira Gandhi Kala Niketan” in New Delhi.
6. That the defendants No.1 & 2 held a press meet on 25.11.2013 at Jorhat press Club Jorhat, wherein both the defendants made various defamatory statements/averments against the plaintiff which was absolutely baseless, concocted and totally false .That the defendants in their baseless/false and defamatory statements stated that the plaintiff has achieved various awards including Guinness World Records , Asia book of by playing fraud and these records were purchased by him by paying money and his doctorate degree conferred by world record University V.K was also purchased.
7. That he plaintiff states that the said press meet was widely covered by electronic media in Assam as well as print media such as daily news papers of Assam

and it was widely published in News papers on 26.11.2013 which totally defamed the plaintiff by the defamatory statements of/remarks of the defendants damaging the reputations, images, estimation of the plaintiff among his friends, well wishers and public at large.

8. That thereafter the defendant no.3 held a press meet at “upasana palace” in Guwahati on 29.01.2014 and alleging “Dhan Dillei etia Jikunu Loke Gorhibo pare Jikunu Abhilekh” which clearly defamed the plaintiff crossing all limits of decency in public life which has lowered down the plaintiff’s image, reputations, accomplishment achievements before the family members, friends, relatives, well wishers at large.

9. That the plaintiffs states that the said press meet was widely covered by various, vernacular, Newspapers of Assam and published these highly defamatory statements/remarks of the defendant no.4 to 7 published these news items matter various captions/headlines on 30th January and also on 1st February 2014.

10. That the defendants in their various defamatory statements/remarks stated that the plaintiff has been carrying a business of purchasing degrees/awards.

That the plaintiff has been cheating the general public of Assam in his fraudulent achievement as well as fraudulent degrees, thereby playing with emotions of general public.

11. That the defendants made defamatory statements/remarks stating that the plaintiff received the honorary doctorate degrees by paying Rs.50, 000/- therefore, said doctorate degree is fraudulent.

12. That both by the press meet 25.11.2013 held at Jorhat press club by the defendant No.1 & 2 and press meet held by defendants no.3 held on 29.01.2014 at Guwahati, the defendants, baseless and concocted remarks with an intention to defame the plaintiff before his family, friends, relatives, well-wishers and people at large and publication and telecast of these press meet immensely injured the plaintiff in p0erson and his name and fame has been lowered down and it has caused irreparable loses and injuries. That the defendants not only defamed the plaintiff but also those esteemed institutions, organisation and Universities who conferred these awards and degrees to the plaintiff.

13. That the defamatory statements/remarks is far from true and correct facts and plaintiff has reason to

believe and apprehended that the defendants has stated the statements with malicious and malafide intention to harm the plaintiff's interest that the publications and Telecasts of these press meet events by various news papers of Assam including proforma defendants 4 to 7 has caused an irreparable lo9ss and injuries of reputation of the plaintiff and the plaintiff has been questioned and subjected to contempt of reliable among his family , friends, well-wishers and others.

14. That the plaintiff issued legal notice to defendant no 1 &2 on dated 02/01/2014 demanding and tendering an unconditional apology in writing to the plaintiff besides publishing a correct statements of the plaintiff about the correct facts of the plaintiff's achievements and awards in these respective News paper/ electronic media wish the same prominence as published and telecasted on 25/ 11/2013, but the defendants no 1 & 2 willfully did not respond to the pleader's notice and pay any heed to it., instead the defendants no 1 &2 futher held a press meet on 29/01/2014 at Upasana Palace in Guwahati and further defamed the plaintiff. It is pertinent to mention

here that the plaintiff did not issue any pleader's notice on defendant no 3 .

15. That the plaintiff humbly submit that due to the above stated defamation statements made by the defendants wise malafide and malicious manner the plaintiff's reputation , honesty, hard work, image , integrity etc. has been lost for the rest of the life and these libel were caused by the defendants specially under a large conspiracy and collision.

16. 15. That the plaintiffs humbly submit that every persons in modern society has his valuable right to preserve his reputation against the world and the defendants to suppress his own misdeeds cannot question the integrity of the plaintiff and cannot defame the plaintiff as his whims and fancies.

17. 16. That the plaintiff humbly submit that under the above facts and circumstances due to sustain defamatory statements / remarks of defendants made in the press meet at Jorhat on dated 25/11/2013 as well as 29/01/2014 made at Guwahati the plaintiff's honesty, integrity, fame, hard work has been lost before his lakh of friends, college ,well-wisher, relatives and even before his own family members,

therefore the main defendants are liable to pay compensation in the form of damages etc.

18. That the cause of action arose on 29.11.2013 when the defendant no. 1 & 2 held press meet at Jorhat Press club which subsequently published and telecast both in print and electronic media, on 29.01.2014, when the defendant no. 3 held another press meet at Guwahati which was published and telecast both by the print media and electronic media on 30.01.214 and on 02.01.2014 when the plaintiff issued pleader notice upon the defendant no. 1 & 2 and all other subsequent date/ dates which the defendants jointly and severely carried on these defamatory statements/ remarks.

It is therefo0pre prayed the Hon'ble court would be graciously enough to pass a decree

I.....against the main defendants jointly and severally

II. Pass a decree of injunction restraining the defendants from carrying on such defamatory and false

campaign against the plaintiff in future.

III. any other relief /reliefs which the plaintiff entitled to.

IV. cost of the suit.

For which the plaintiff shall remain ever prayed.